

Jordan, Sheron

From: _Regulatory Comments

Sent: Thursday, July 20, 2006 8:55 AM

To: Jordan, Sheron

Subject: FW: Meriwest Credit Union - Arnette Grossweiler - Comments on Proposed Rule Part 740

From: Arnette Grossweiler [mailto:Agrossweiler@meriwest.com]

Sent: Wednesday, July 19, 2006 12:46 PM

To: _Regulatory Comments

Subject: Meriwest Credit Union - Arnette Grossweiler - Comments on Proposed Rule Part 740

One of NCUA's proposed changes to the Share Insurance Official Sign is a requirement to display the official sign no later than 60 days after receiving the signs from NCUA. We understand that NCUA will provide the initial revised signs free of charge and will make a downloadable graphic available on the agency website for credit unions to use in marketing. The proposed rule imposes a penalty of up to \$100 per day for each day that an insured credit union violates NCUA's rules regarding usage of the share insurance official sign and the official advertising statement that the credit union must include in their advertisements.

Meriwest Credit Union feels that 60 days is an acceptable period to display the revised signs at places where deposits are accepted and on its website. However, Meriwest feels that the 60-day compliance period is too restrictive for changing the graphics on pieces displaying the official sign and that the penalty is excessive. There is an enormous expense involved in reprinting all pieces with the official sign. It would also require disposing of unused inventory at additional costs. As an alternative, we suggest that NCUA either delete the penalty or allow a phase-in period for changing the graphic on printed pieces. We would prefer it be open-ended or until supplies are naturally replenished. If NCUA requires a time period, we suggest 12 months.

Arnette Grossweiler, NCCO

Meriwest Credit Union * Chief Compliance Officer

5615 Chesbro Ave * San Jose, CA * 95123-3406

Direct: 408-363-3223 * FAX: 408-363-3390

Toll Free: 877-637-4937, Ext. 3223

E-mail: agrossweiler@meriwest.com